

**BEFORE THE  
ILLINOIS COMMERCE COMMISSION**

<b>COMMONWEALTH EDISON COMPANY</b>	)	
	)	
<b>Petition to Determine the Applicability of</b>	)	
<b>Section 16-125(e) Liability to Events Caused By the</b>	)	<b>ICC Docket No. 11-0662</b>
<b>February 1, 2011 Storm System</b>	)	

**DIRECT TESTIMONY AND EXHIBITS**

**OF**

**GEORGE E. OWENS, P.E.**

**ON BEHALF OF**

**THE OFFICE OF THE ATTORNEY GENERAL**

**STATE OF ILLINOIS**

**FEBRUARY 14, 2012**

Exhibit List

**Attachment A, consisting of:**

11-0588 – Direct Testimony AG Ex. 1.0 Owens  
11-0588 – Direct Testimony Ex. GEO-1  
11-0588 – Direct Testimony Ex. GEO-2  
11-0588 – Direct Testimony Ex. GEO-3  
11-0588 – Direct Testimony Ex. GEO-4  
11-0588 – Direct Testimony Ex. GEO-5  
11-0588 – Direct Testimony Ex. GEO-6  
11-0588 – Direct Testimony Ex. GEO-7  
11-0588 – Direct Testimony Ex. GEO-8  
11-0588 – Direct Testimony Ex. GEO-9  
11-0588 – Direct Testimony Ex. GEO-10  
11-0588 – Direct Testimony Ex. GEO-11  
11-0588 – Direct Testimony Ex. GEO-12  
11-0588 – Direct Testimony Ex. GEO-13  
11-0588 – Direct Testimony Ex. GEO-14  
11-0588 – Direct Testimony Ex. GEO-15  
11-0588 – Direct Testimony Ex. GEO-16  
11-0588 – Direct Testimony Ex. GEO-17  
11-0588 – Direct Testimony Ex. GEO-18  
11-0588 – Direct Testimony Ex. GEO-19  
11-0588 – Direct Testimony Ex. GEO-20  
11-0588 – Direct Testimony Ex. GEO-21  
11-0588 – Direct Testimony Ex. GEO-22  
11-0588 – Direct Testimony Ex. GEO-23  
11-0588 – Direct Testimony Ex. GEO-24  
11-0588 – Direct Testimony Ex. GEO-25

BEFORE THE  
ILLINOIS COMMERCE COMMISSION

COMMONWEALTH EDISON COMPANY	)	
	)	
Petition to Determine the Applicability of	)	
Section 16-125(e) Liability to Events Caused By the	)	ICC Docket No. 11-0662
February 1, 2011 Storm System	)	

DIRECT TESTIMONY

OF

GEORGE E. OWENS, P.E.

1    **Q:    PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2    A:    My name is George E. Owens. I am employed by Downes Associates, Inc. (“DAI”).  
3        My business address is 2129 Northwood Drive, Salisbury, Maryland 21801.

4    **Q:    WHAT IS YOUR PROFESSIONAL BACKGROUND?**

5    A:    I joined DAI in 1974 and served in the capacity of Project Engineer until 1980. For the  
6        past thirty-two years, I have served as President of DAI and as DAI’s Chief Power  
7        Engineer. Throughout this period, my duties have included analyzing and designing  
8        high voltage electrical distribution and transmission facilities, substations, generating  
9        plants, supervisory control and data acquisition (“SCADA”) systems, metering, and  
10       relay control systems. Additionally, for the past ten years, I have served as the  
11       official representative within the PJM Interconnection (“PJM”) Regional  
12       Transmission Organization (“RTO”) for several municipally-owned electrical

1 utilities. I am a member of PJM's Planning Committee, Transmission Expansion  
2 Advisory Committee, Markets and Reliability Committee, and Members Committee.  
3 During this same time period, I have served as a member of numerous PJM Working  
4 Groups and Task Forces focusing on RTO reliability, transmission planning, and new  
5 generation interconnection. I also served for two years on the Mid-Atlantic Area  
6 Council ("MAAC") Administrative Board.

7 **Q: PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**  
8 **PROFESSIONAL QUALIFICATIONS.**

9 A: I received a Bachelor of Engineering Science Degree in Electrical Engineering from  
10 the Johns Hopkins University in 1969, a Master of Science Degree in Physical  
11 Oceanography from Texas A&M University in 1971, and I completed two additional  
12 years of graduate study in Coastal and Ocean Engineering within the Civil  
13 Engineering Department of Texas A&M University. In 1974, I graduated from the  
14 U.S. Army Corps of Engineers Basic Engineering Officer Training program at Ft.  
15 Belvoir, Virginia. In addition, I have taken numerous professional development  
16 courses in electrical metering, electrical short circuit analysis, and electrical system  
17 operation. I am a registered professional engineer licensed in seventeen states  
18 including the State of Illinois and the District of Columbia. A complete description  
19 of my professional qualifications is attached to this testimony.<sup>1</sup>

20 **Q: HAVE YOU BEEN RETAINED IN THIS MATTER?**

21 A: Yes. I have been retained as an expert witness in this proceeding by the Office of the  
22 Illinois Attorney General.

---

<sup>1</sup> Exhibit GEO-1 (George E. Owens Professional Qualifications)

1   **Q:    HAVE YOU PREVIOUSLY TESTIFIED AS AN EXPERT WITNESS BEFORE**  
2   **A PUBLIC UTILITY REGULATORY AGENCY?**

3   A:    Yes. I have provided expert testimony before the District of Columbia Public Service  
4       Commission, the Maryland Public Service Commission, and the Delaware Public  
5       Service Commission. In addition, I have provided testimony to the Federal Energy  
6       Regulatory Commission. I also testified on behalf of the Office of the Illinois  
7       Attorney General in Illinois Commerce Commission Docket 11-0588.

8   **Q:    WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

9   A:    I have been asked by the Office of the Attorney General, State of Illinois, to review  
10       prior filings in this proceeding and offer my professional opinion and guidance to this  
11       Commission on whether the outages experienced in the ComEd service territory in  
12       relation to the February 1, 2011 storm system were caused by “unpreventable damage  
13       due to weather events or conditions.” I have attached my testimony served in ICC  
14       Docket 11-0588 as my direct testimony in this proceeding. My testimony focuses on  
15       three areas of concern: vegetation management, age of facilities, and system  
16       modernization.

17   **Q:    ARE YOU FAMILIAR WITH THE EVENTS LEADING UP TO THE**  
18   **INITIATION OF THESE PROCEEDINGS BY THE COMMISSION?**

19   A:    Yes. During and after February 1, 2011, ComEd and its customers experienced  
20       outages following the February 1-2 blizzard. This proceeding specifically involves  
21       the Petition For Waiver filed on September 27, 2011, with ComEd requesting that it  
22       be relieved of liability to its customers for damages resulting from outages of more

1 than 4 hours, affecting more than 30,000 customers, occurring after the February 1,  
2 2011 storm.

3 **Q: ARE YOU FAMILIAR WITH THE COMMONWEALTH EDISON**  
4 **COMPANY?**

5 A: Yes, I am familiar with the Commonwealth Edison Company (“ComEd”). ComEd is  
6 an electric distribution company serving the northern region of the State of Illinois  
7 and the City of Chicago. It is a wholly-owned subsidiary of Exelon, a publicly traded  
8 energy company that in addition to ComEd, owns the Philadelphia Electric Company  
9 which serves the southeastern region of the State of Pennsylvania, and the City of  
10 Philadelphia. During the week of December 5, 2011, I performed field inspections of  
11 numerous areas within ComEd’s Illinois service territory. These field inspections  
12 were conducted with the Attorney General’s Office within the Cities of Elmhurst,  
13 Evanston, Highland Park, Lake Forest, Park Ridge, Rockford, Rolling Meadows and  
14 Villages of Arlington Heights, Glenview, Morton Grove, Niles, and Schaumburg.

15 **Q: IS THE TESTIMONY YOU FILED IN ICC DOCKET 11-0588 APPLICABLE**  
16 **TO THIS PROCEEDING, ICC DOCKET 11-0662?**

17 A. Yes. Although the inspections I performed and the data I analyzed in my attached  
18 testimony were initially prepared for ICC Docket 11-0588, my testimony applies  
19 equally to this proceeding. The effects of wind on the trees surrounding ComEd’s  
20 distribution system are the same regardless of whether the storm is a winter blizzard  
21 or a summer thunderstorm. Furthermore, the effect of snow causing tree branches to  
22 fall and lean on electric lines during a blizzard is similar in nature to the effect of rain

1 and wind during a thunderstorm. I have attached my testimony from Docket 11-  
2 0588 as Attachment A and incorporate it as my testimony in this docket.

3 **Q: YOUR INSPECTION OCCURRED SEVERAL MONTHS AFTER THE**  
4 **WINTER STORM THAT IS THE SUBJECT OF THIS DOCKET. WHY DO**  
5 **YOU BELIEVE THAT YOUR AFTER-THE-FACT INSPECTION CAN**  
6 **SHOW THE CONDITION OF COMED'S SYSTEM *BEFORE* THE STORMS?**

7 A. The majority of the overhead distribution circuits that we inspected were clearly  
8 facilities that had been in service for decades. I would estimate that the average age  
9 of most of these facilities is forty years. The observed wires, poles, transformers,  
10 fuses, and switches had obviously been in service for many years before the  
11 referenced storms occurred. In addition, the lack of adequate vegetation management  
12 that was observed had obviously occurred over a number of years as evidenced by  
13 mature tree growth, again clearly predating the February 1, 2011 storm system. In  
14 addition, because we inspected the ComEd system in December, we were able to  
15 view the system without the summer foliage. There are many deciduous trees (as  
16 opposed to conifers or other evergreens) in the areas we observed, so we were able to  
17 see the extent of overgrowth in winter months when there are no or only limited  
18 leaves on the trees.

19 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

20 A: Yes it does.